

ATTACHMENT A

Attachment A¹

- **CD-US-0192513**, **CD-US-0045770A**, and **CD-US-0127737A**: August 2017 memoranda described as “Pre-decisional deliberations, including pros and cons, regarding family unit separations and changes to credible fear process[.]”
- **CD-US-0199569**: August 2017 memorandum described as “Predecisional deliberations regarding options other than family detention during pending removal proceedings.”
- **CD-US-0192263** and **CD-US-0153446**: appear to be materially different versions of the memorandum at CD-US-0199569, based on the limited unredacted content available to Plaintiffs.²
- **CD-US-0099382A** and **CD-US-0033684**: memoranda described as “Predecisional deliberations regarding immigration enforcement operations and policy proposals, including credible fear processes and limiting reliance of family detention[.]”
- **CD-US-0192240**: undated memorandum described as “Draft document containing pre-decisional deliberations regarding streamlining immigration processes,

¹ Documents ending in “A” indicate those where the government revised its redactions following its reassessment of Plaintiffs’ March Sample Set. Asterisked documents are those for which the government revised its privilege log entry after the government’s reassessment.

² CD-US-0199569, CD-US-0192263 and CD-US-0153446 appear to be different variations of a memorandum clawed back by the government, CD-US-0046648, which is the subject of Plaintiffs’ recent request, pursuant to the Court’s 502(d) Order, *C.M.* ECF No. 56; *A.P.F.* ECF No. 42, for a judicial determination of the government’s privilege claim.

including expedited credible fear processing, while maintaining family unity and co-location.”³

- **CD-US-0050134**: November 2017 memorandum described as “Decision paper with options and recommendations but no decision.”
- **CD-US-0026417A**: December 2017 memorandum described as “Predecisional deliberations and recommendations regarding possible prosecution policies for consideration relating to members of FAMUs in El Paso sector.” Based on the unredacted language available to Plaintiffs, this document may be a substantially different version of the memorandum at **CD-US-0050134**.
- **CD-US-0063242**: undated memorandum described as “Memorandum from the Office of Civil Rights and Civil Liberties (CRCL) detailing serious constitutional, U.S. law and treaty concerns regarding the apprehension, custody, and transportation of alien children.”
- ***CD-US-0190917**: August 9, 2017 email described as “Predecisional deliberations relating to addressing increase in family units and unaccompanied children border crossings[.]”
- ***CD-US-0108517A**: October 19, 2017 email described as “Predecisional deliberations regarding proposal relating to separate housing of family members.”

³ This document may be a later iteration of the memoranda at CD-US-0099382A and CD-US-0033684, but based on the limited unredacted information available to Plaintiffs and the privilege log descriptions Plaintiffs cannot determine with certainty whether these documents are substantially similar memoranda.

- ***CD-US-0097310**: December 16, 2017 email described as “Predecisional deliberations regarding various options presented for discussion in UAC Options memorandum[.]”
- ***CD-US-0032257**: April 6, 2018 email described as “Predecisional deliberations regarding possible approaches for referrals of 1325 prosecutions under the Zero Tolerance Policy.”
- ***CD-US-0017478**: April 18, 2018 email described as “Pre-decisional discussion between USANM and USA TXW regarding local implementation of ZTP[.]”
- ***CD-US-0017269**: April 24, 2018 email described as “Pre-decisional document discussing an inquiry from the Attorney General regarding the potential use of USMS facilities[.]”
- ***CD-US-0017259**: April 25, 2018 email described as “Pre-decisional discussion between EO USA and USAO NM regarding resource constraints related to the local implementation of ZTP. Document discusses potential changes related to the same that have yet to be decided upon[.]”
- **CD-US-0048191**: April 30, 2018 email described as “Discussion of options among senior ICE staff for a potential policy to reunify separated family units prior to removal. Email makes clear that no final issue has been reached and that further deliberation on this subject is necessary[.]”

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C.M. v. United States, 2:19-cv-05217
A.P.F. v. United States, 2:20-cv-0065

- **CD-US-0017809**: May 5, 2018 email described as “Discussion among USAOs on Southwest Border regarding potential responses to various CBP sectors’ policy of prosecuting all amenable adults for immigration violation.”
- ***CD-US-0024980**: May 19, 2018 email described as “Pre- decisional deliberations regarding possible modification in priorities of prosecutions under Zero Tolerance policy.”
- ***CD-US-0039382**: June 26, 2018 email described as “The redaction is a CBP draft policy proposal regarding emotion [sic] care for children in Border Patrol custody, and edits to the language to obtain approval and funding for the policy, not yet final.”